

Application No.: 10/772,327

3

Docket No.: 333772000900

**REMARKS**

Claims 1-24 stand examined and are rejected on various grounds. These objections and rejections are addressed in the appropriate sections below.

In view of the preceding remarks made herein, the present application is believed to be in condition for allowance.

**35 U.S.C. § 102(b)**

Claims 1-5 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,028,439 to Arkin et al. (hereinafter the Arkin reference)

In response, Applicants respectfully submit that the Arkin reference does not teach or disclose the site controller of the present application. As shown in Figure 2 of the present application, the system controller 102 controls multiple site controllers 104, which control one or more test modules 108 through a module connection enabler 106. Each site controller of the present application may run on a different local operating system (see paragraph [0020] line 3) and each site controller may be coupled to multiple test modules. The multiple test modules may have different hardware implementations, such as switch connections, bus connections, ring connections, and star connections (see paragraph [0036] lines 4-12).

As shown in Figure 1 of Arkin, the host 16 drives the test modules 14 through the network hub 17. There is no site controller disclosed in Arkin. In the Office Action, the Examiner considered the test module 14 of the Arkin reference as the site controller because it also has a microcontroller (see Arkin, Figure 2, 30). In column 7, line 32 of Arkin, the specification describes the "test modules 14 are similar". There is no teaching of having the microcontroller running on different local operating system for each test module. In addition, since the microcontroller is located within a test module, the Arkin reference does not teach the microcontroller being coupled to multiple test modules of different hardware implementations.

pa-988556

Application No.: 10/772,327

4

Docket No.: 333772000900

One of the problems the present invention solves is to provide a platform to support multiple testing environments with different software (operating systems and applications) and different hardware configurations that can work together. Each site controller may represent a previously developed tester with its own specialized hardware and software components. (see paragraph [0004]) On the other hand, the problem the Arkin reference attempts to solve is to perform different test sequences on separate sets of integrated circuits within the same tester system. Thus, the Arkin reference does not teach or suggest each and every claim element of the present invention.

**35 U.S.C. § 103(a)**

In the Office Action, claims 6-8, 24 are rejected under 35 U.S.C. § 103 as being allegedly obvious over Arkin et al. in view of Published Application US 2002/0183955 A1 to Adler; claims 9-14 are rejected under 35 U.S.C. § 103 as being allegedly obvious over Arkin and Adler as applied to claims 6-8, and further in view of Hejlsberg et al (US 2003/0167277); and claim 20 is rejected under 35 U.S.C. § 103 as being allegedly obvious over Arkin, Adler, and Hejlsberg as applied to claims 9-14 and 19, and further in view of Shah (6,782,336).

In response, for the reasons presented above, since the Arkin reference does not disclose each and every element of the independent claim 1, its dependent claims 2-24 can not be found obvious over Arkin et al. in view of cited references to Adler, Hejlsberg, and Shah.

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue. If it is determined that a telephone conference would expedite the prosecution of this application, the Examiner is invited to telephone the undersigned at the number given below.

In the event the U.S. Patent and Trademark office determines that an extension and/or other relief is required, applicant petitions for any required relief including extensions of time and authorizes the Commissioner to charge the cost of such petitions and/or other fees due in connection

pa-988556

Application No.: 10/772,327

5

Docket No.: 333772000900

with the filing of this document to Deposit Account No. 03-1952 referencing docket no. 333772000900. However, the Commissioner is not authorized to charge the cost of the issue fee to the Deposit Account.

Dated: September 14, 2005

Respectfully submitted,

By 

Thomas Chan

Registration No.: 51,543  
MORRISON & FOERSTER LLP  
755 Page Mill Road  
Palo Alto, California 94304-1018  
(650) 813-5616

pa-988556